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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 4:25-CR-00126 JST
)	
Plaintiff,)	AUSA LEE DECLARATION ISO UNITED
)	STATES' OPPOSITION TO DEFENDANT'S
v.)	MOTION TO MODIFY PRE-TRIAL ASSET
)	RESTRAINT
)	
KENNETH W. MATTSON,)	
)	Date: July 31, 2025
Defendant.)	Time: 9:30 a.m.
)	Judge: Hon. Jon S. Tigar

I, Christoffer Lee, declare and state as follows:

1. I am an Assistant United States Attorney in the Northern District of California, and I am assigned to represent the United States in the above-captioned matter.

2. I am informed and believe that the exhibits attached herein are what they purport to be.

3. Attached as **Exhibit A** is a RealQuest Property Detail Report for 62 Farragut Avenue A in Piedmont, CA, reflecting owner name Kenneth W. Mattson.

4. Attached as **Exhibit B** is a RealQuest Property Detail Report for 62 Farragut Avenue B

LEE DECL. ISO U.S. OPP. TO DEF.'S MOT. TO MODIFY PRE-TRIAL ASSET RESTRAINT
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1 in Piedmont, CA, reflecting owner name K S Mattson Partners.

2 5. Attached as **Exhibit C** is a RealQuest Property Detail Report for 1834-36 Ocean Front in
3 Del Mar, CA.

4 6. Attached as **Exhibit D** is a July 22, 2024 Deed of Trust with Assignment of Rents
5 between Equitable Ocean Front LLC and KS Mattson Partners.

6 7. Attached as **Exhibit E** is an April 25, 2025 Correction Deed of Trust with Assignment of
7 Rents between Equitable Ocean Front LLC and KS Mattson Partners.

8 8. Attached as **Exhibit F** and **Exhibit G** are Federal Bureau of Investigation Form 302
9 Memoranda of Interviews with WITNESS 1, which have been filed under seal.

10 9. Attached as **Exhibit H** is a “Co-Ownership Agreement” for 210 La Salle between KS
11 Mattson Partners LP and WITNESS 1, which has been filed under seal.

12 10. Attached as **Exhibit I** is a sales contract between Buick GMC of Vacaville and Stacy
13 Mattson for a 2024 GMC Yukon XL, which has been filed under seal.

14 11. Attached as **Exhibit J** is a sales contract between Buick GMC of Vacaville and Stacy
15 Mattson for a 2025 GMC Sierra 2500HD, which has been filed under seal.

16 12. Attached as **Exhibit K** are records from Bonhams Auction House, including an email
17 communication with SURETY 1 regarding the sale of vehicles and settlement statements reflecting the
18 same, which have been filed under seal.

19 13. Attached as **Exhibit L** is Federal Bureau of Investigation Form 302 Memoranda of
20 Interview with two witnesses, which has been filed under seal.

21
22 I declare under penalty of perjury that the foregoing is true and correct to the best of my
23 knowledge.

24
25 Dated: July 9, 2025

/S/
CHRISTOFFER LEE